

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods
Bern, 10-11 September 2020 and Geneva, 14-18 September 2020
Item 3 of the provisional agenda
Standards

8 September 2020

Comments on document ECE/TRANS/WP.15/AC.1/2020/52

Transmitted by the Government of Switzerland

Summary

- Executive summary:** Step 1 and last sentence in step 2 of point 2.1 in document ECE/TRANS/WP.15/AC.1/2020/52 raise the question of how RID Member States/Contracting Parties to ADR that are not CEN-CENELEC members could be involved at the earliest stage of the drafting and decision-making process.
- Action to be taken:** Review the procedure described in document ECE/TRANS/WP.15/AC.1/2020/52 and illustrated by the first flow-chart in the light of following considerations.
- Related document:** ECE/TRANS/WP.15/AC.1/2020/52.

Introduction

1. In step 2 of point 2.1 in document ECE/TRANS/WP.15/AC.1/2020/52, CEN/CENELEC refer to a simplified procedure which implies skipping of Formal Vote (see also point 5 of document ECE/TRANS/WP.15/AC.1/2020/58). Under this approach it would be sufficient for the members of the Working Party on Standards to accept the standards, if conformity with RID, ADR and ADN is established.
2. The Joint Meeting is the instrument that WP.15 and the RID Committee of Experts have set up to define common rules for inland transport. Member States/Contracting Parties may participate in the Joint Meeting. The Joint Meeting includes a number of States which are not represented in the CEN/CENELEC Groups, including countries outside the European continent. In a further decision of the Conference of the Contracting Parties to ADR in May 2019, the term "European" was deleted from the title of the ADR Agreement. It is to be expected that the scope of this agreement will be extended beyond the European States which do not participate in the work of CEN or CENELEC. For all countries which either cannot be members of CEN/CENELEC or do not have the possibility to send experts to the Working Group on Standards but participate in the plenary session of the Joint Meeting, it is essential that decisions on standards are taken in the body in which they can have a right to vote, which is the plenary session of the Joint Meeting.
3. In this respect, it is worth recalling an important point contained in document ECE/TRANS/WP.15/AC.1/130, Annex III, item 15:

“It was stated that even if the Joint Meeting and its Working Group on Standards mainly verified the compatibility of draft standards with the

requirements of RID/ADR/ADN, any other technical comment could also be transmitted to the Working Group on Standards to allow for the participation of countries that were not members of CEN/CENELEC and thus could not make comments on the drafts through national committees. “

4. Given the expected new geographical scope of our texts, it is not the right time to limit the possibility for States which cannot become CEN/CENELEC members to contribute to this normative and geographical development of our agreements by restricting the decision-making power of these countries which they can only exercise through the plenary sessions of the Joint Meeting. Their participation is important from the earliest stages of normative development.

3. For these reasons, it is suggested that the Joint Meeting should examine if the proposed procedure allows countries that are not members of CEN/CENELEC to effectively transmitting technical comments to the Working Group on Standards and how these comments are integrated in a formal decision-making process.
